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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 16-00227-SI-5
)	
Plaintiff,)	STIPULATION TO EXCLUDE TIME;
)	[PROPOSED] ORDER
v.)	
)	
BTC-E, A/K/A CANTON BUSINESS)	
CORPORATION,)	
)	
and)	
)	
ALEXANDER VINNIK,)	
)	
Defendants.)	

The parties appeared before the Court for a motions hearing and trial setting conference on June 9, 2023. At that time, trial was set for February 5, 2024, and a further status conference was set for June 30, 2023. The parties appeared on June 30, 2023, during which the Court set a pretrial schedule.

It has been stipulated by and between counsel for the United States and counsel for the defendant, Alexander Vinnik, that time be excluded under the Speedy Trial Act from June 9, 2023, through February 5, 2024. This time exclusion will allow defense counsel to continue to prepare, including by reviewing the discovery already produced. For this reason, the parties stipulate and agree that excluding time from June 9, 2023, through February 5, 2024 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from June 9, 2023, through February 5, 2024 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

Undersigned government counsel certify that they have obtained approval from counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

ISMAIL J. RAMSEY
United States Attorney

DATED: July 6, 2023

/s/
CLAUDIA QUIROZ
KATHERINE LLOYD-LOVETT
Assistant United States Attorneys
C. ALDEN PELKER
Trial Attorney, CCIPS Assistant United States
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DATED: July 6, 2023

/s/
DAVID RIZK
Counsel for Defendant ALEXANDER VINNIK

[PROPOSED] ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court finds that failing to exclude the time from June 9, 2023, through February 5, 2024, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time June 9, 2023, through February 5, 2024, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from June 9, 2023, to February 5, 2024, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: _____

HON. SUSAN ILLSTON
United States District Judge